

# DeOrchis & Partners, LLP

## Florida Office:

8751 W. Broward Blvd., Ste. 203  
Ft. Lauderdale, FL 33324  
(954) 652-0100

## Attorneys and Proctors in Admiralty

61 Broadway, 26<sup>th</sup> Floor  
New York, New York 10006-2802

## Connecticut Office:

24 Hoyt Street  
Stamford, CT 06905  
(203) 323-9120

Telephone: (212) 344-4700

Telefax: (212) 422-5299

www.marinelex.com

## Massachusetts Office:

2355 Main Street, P.O. 186  
S. Chatham, MA 02059  
(508) 432-2121

January 9, 2008

Christopher H. Mansuy  
cmansuy@marinelex.com

Honorable Robert P. Patterson  
U.S. District Judge  
U.S. District Courthouse  
500 Pearl Street  
New York, NY 10007-1312

**MEMO ENDORSED**

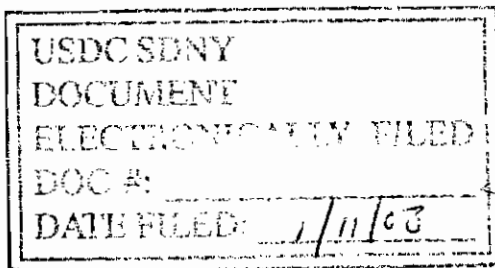
Re: *The Travelers, et al., v. M/V EASLINE TIANJIN, et al.*  
07 Civ. 3104  
Our file no.: 876-9

Dear Judge Patterson:

We represent defendant Hyundai Merchant Marine, Ltd. On October 29, 2007, Your Honor granted defendant's motion to dismiss the complaint of Fireman's Fund Insurance Co., Inc. by reason of the forum selection clause in the ocean bill of lading issued by Hyundai Merchant Marine. At the same time, Your Honor placed the action on the suspense calendar affording plaintiff the opportunity to show cause before January 1, 2008 why Judgment should not be entered.

Plaintiff Fireman's Fund has filed no documents suggesting that the Court's decision should be reconsidered.

Accordingly, we respectfully request that the Court enter judgment dismissing the Fireman's Fund complaint in accordance with the October 29, 2007 Memo Endorsement.



CHM:kc

W:\876-9\Letters\Judge Patterson, 01-09-08, Chm.Doc 1/9/08-kc

Respectfully,

DEORCHIS & PARTNERS, LLP

By

Christopher H. Mansuy

*application granted*  
*Goodrich*  
*Print Plaintiff*  
*USDC*  
*1/11/08*

Honorable Robert P. Patterson  
U.S. District Judge  
January 9, 2008  
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cc:

Badiak & Will  
106 Third Street  
Mineola, NY 11501-4404  
Attention: James P. Krauzlis, Esq.